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U.S. Department of Energy
Idaho Operations Office

Staging, Storage, Sizing, and Treatment Facility Construction Waste Management Plan

INEEL
Idaho National Engineering and Environmental Laboratory
Home of Science and Engineering Solutions

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ABSTRACT

The Waste Area Group 3 Operable Unit 3-13 Record of Decision designates the INEEL CERCLA Disposal Facility, including the Staging, Storage, Sizing, and Treatment Facility, as the on-Site disposal facility for Comprehensive Environmental Response, Compensation, Liability Act-generated wastes within the Idaho National Engineering and Environmental Laboratory boundaries. This Waste Management Plan applies to the construction phase of the Staging, Storage, Sizing, and Treatment Facility and addresses the regulatory considerations and waste management assumptions pertinent to the anticipated construction waste streams.

This document is intended to function as a management planning tool and is being developed in conjunction with the Remedial Design/Construction Work Plan design activities to support waste management activities associated with the Staging, Storage, Sizing, and Treatment Facility construction. Waste management associated with the operations of the INEEL CERCLA Disposal Facility is not a part of this plan.

CONTENTS

FIGURES

TABLES

ACRONYMS

AOC	area of contamination
ARAR	applicable or relevant and appropriate requirement
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFA	Central Facilities Area
COCA	Consent Order and Compliance Agreement
CSA	CERCLA Storage Area
DOE	Department of Energy
DOE-ID	Department of Energy Idaho Operations Office
DOT	Department of Transportation
EPA	Environmental Protection Agency
FFA/CO	Federal Facility Agreement and Consent Order
FS	feasibility study
HW	hazardous waste
HWD	hazardous waste determination
HWMA	Hazardous Waste Management Act
ICDF	INEEL CERCLA Disposal Facility
IDEQ	Idaho Department of Environmental Quality
INEEL	Idaho National Engineering and Environmental Laboratory
INTEC	Idaho Nuclear Technology and Engineering Center
IW	industrial waste
LLW	low-level waste
MLLW	mixed low-level waste
NPL	National Priorities List
O&M	operation and management
OU	operable unit

PCB	polychlorinated biphenyl
PPE	personal protective equipment
RD/RA	remedial design/remedial action
RD/CWP	remedial design/construction work plan
RCRA	Resource Conservation and Recovery Act
RI	remedial investigation
ROD	Record of Decision
RWMC	Radioactive Waste Management Complex
SOW	scope of work
SSA	Staging and Storage Annex
SSSTF	Staging, Storage, Sizing, and Treatment Facility
TSCA	Toxic Substances Control Act
WAC	Waste Acceptance Criteria
WAG	waste area group
WMP	Waste Management Plan
WP	work plan

Staging, Storage, Sizing, and Treatment Facility Construction Waste Management Plan

1. INTRODUCTION

This Waste Management Plan (WMP) applies to the construction phase of the Staging, Storage, Sizing, and Treatment Facility (SSSTF). The Waste Area Group (WAG) 3 Operable Unit (OU) 3-13 Record of Decision (ROD) (DOE-ID 1999) designates the INEEL CERCLA Disposal Facility (ICDF), including the SSSTF, as the on-Site disposal facility for Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) -generated wastes within the Idaho National Engineering and Environmental Laboratory (INEEL) boundaries. This plan addresses the construction phase of the SSSTF only. Waste management associated with the operations of the ICDF Complex (including the SSSTF, landfill, and evaporation ponds) is not part of this plan and will be included in the ICDF Complex Remedial Action (RA) Work Plan (WP).

The work will proceed as described in the *Remedial Design (RD)/Remedial Action (RA) Scope of Work (SOW) for Waste Area Group 3 Operable Unit 3-13* (DOE-ID 2000a) and the *Remedial Design/Construction Work Plan (RD/CWP) for the WAG 3 SSSTF* (DOE-ID 2002).

1.1 Purpose and Scope

The purpose of this WMP is to function as a management planning tool for identifying and managing the waste streams associated with the SSSTF construction. This WMP is being developed in conjunction with the SSSTF RD/CWP to support the waste management necessary for construction activities. In addition, this WMP supports waste management planning requirements found in U.S. Department of Energy (DOE) orders and fulfills scope requirements of the RD/RA SOW (DOE-ID 2000a).

2. SITE BACKGROUND

The INEEL is a government-owned facility managed by the DOE. The eastern boundary of the INEEL is located 52 km (32 mi) west of Idaho Falls, Idaho. The INEEL site occupies approximately 2,305 km^2 (890 mi^2) of the northwestern portion of the eastern Snake River Plain in southeast Idaho.

2.1 Site Description

The Idaho Nuclear Technology and Engineering Center (INTEC) is located in the south-central portion of the INEEL, as shown in Figure 2-1. The INTEC is a part of WAG 3, which is one of the 10 INEEL WAGs identified in the Federal Facility Agreement and Consent Order (FFA/CO) by the Department of Energy Idaho Operations Office (DOE-ID), the Environmental Protection Agency (EPA), and the Idaho Department of Environmental Quality (IDEQ) (DOE-ID 1991). The OU 3-13 is listed as the "WAG 3 Comprehensive Remedial Investigation (RI)/Feasibility Study (FS)," in the FFA/CO (DOE-ID 1991).

The WAG 3 release sites were grouped according to common contaminant sources. Group 3, referred to as "Other Surface Soils," contains the construction of the SSSTF, which will be located within the WAG 3 area of contamination (AOC), as part of the ICDF Complex shown in Figure 2-2.

2.2 Site History

A Consent Order and Compliance Agreement (COCA) was entered into between DOE and the EPA pursuant to the Resource Conservation and Recovery Act (RCRA) Section 3008(h) in August 1987. The COCA required DOE to conduct an initial assessment and screening of all solid waste and/or hazardous waste disposal units at the INEEL and set up a process for conducting any necessary corrective actions. On July 14, 1989, the INEEL was proposed for listing on the National Priorities List (NPL) (54 FR 29820). The listing was proposed by the EPA under the authorities granted to the EPA by the 1980 CERCLA, as amended by the Superfund Amendments and Reauthorization Act of 1986. The final rule that listed the INEEL on the NPL was published on November 21, 1989 (54 FR 48184).

2.3 Existing Information and Contaminants of Concern

Within the WAG 3 AOC, the SSSTF is situated within the environmentally controlled area identified as site CPP-95 (wind-blown contamination plume), which was evaluated in the *OU 3-13 Remedial Investigation/Baseline Risk Assessment* (DOE-ID 1997). This area was determined to pose no unacceptable risks to site workers. If hot spots of contaminated surficial soils are found during construction, these soils will be managed in accordance with the soil management strategy in the *WAG 3 Institutional Control Plan* (DOE-ID 2000b).

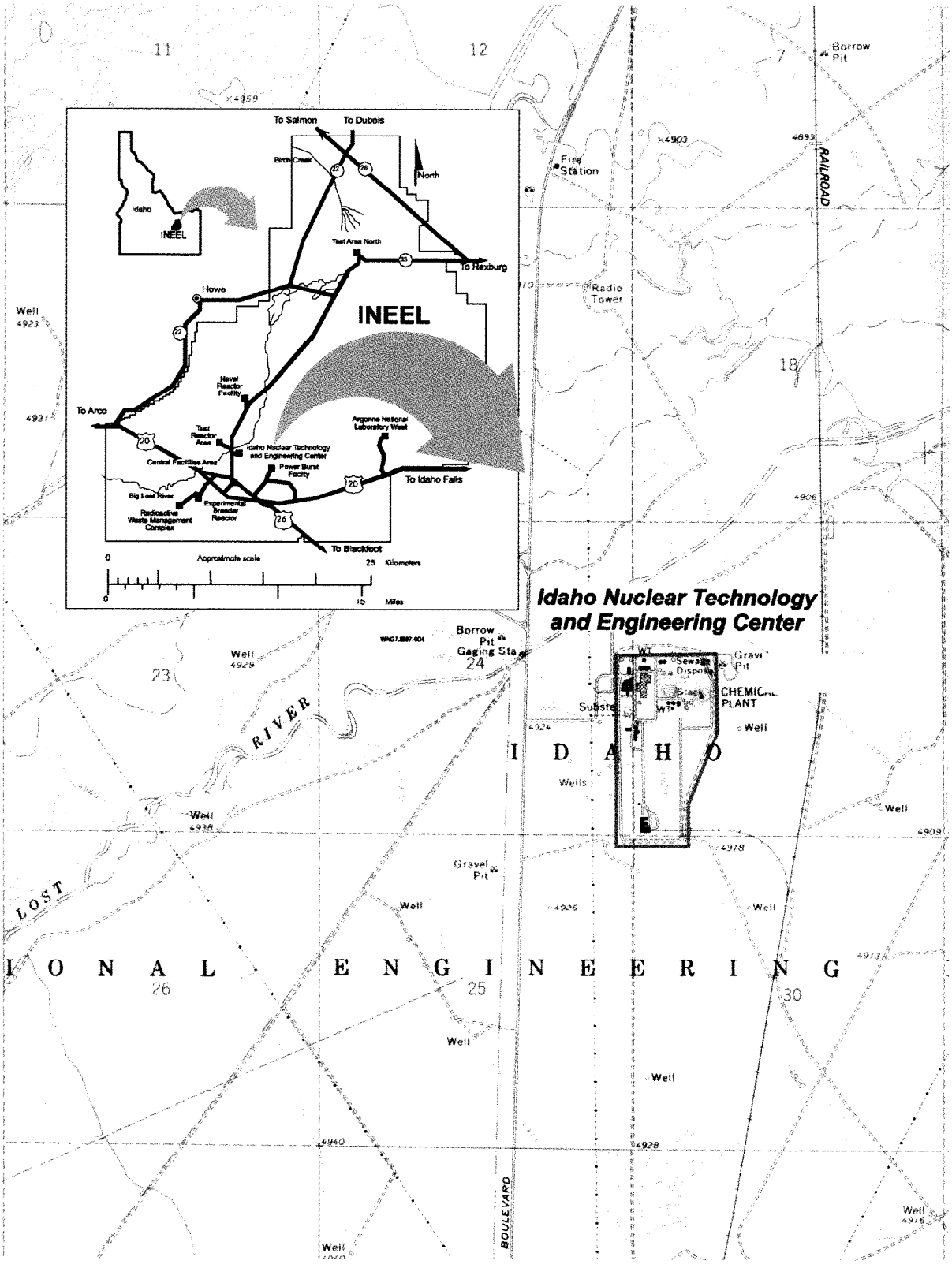

Figure 2-1. Location of INTEC within the INEEL.

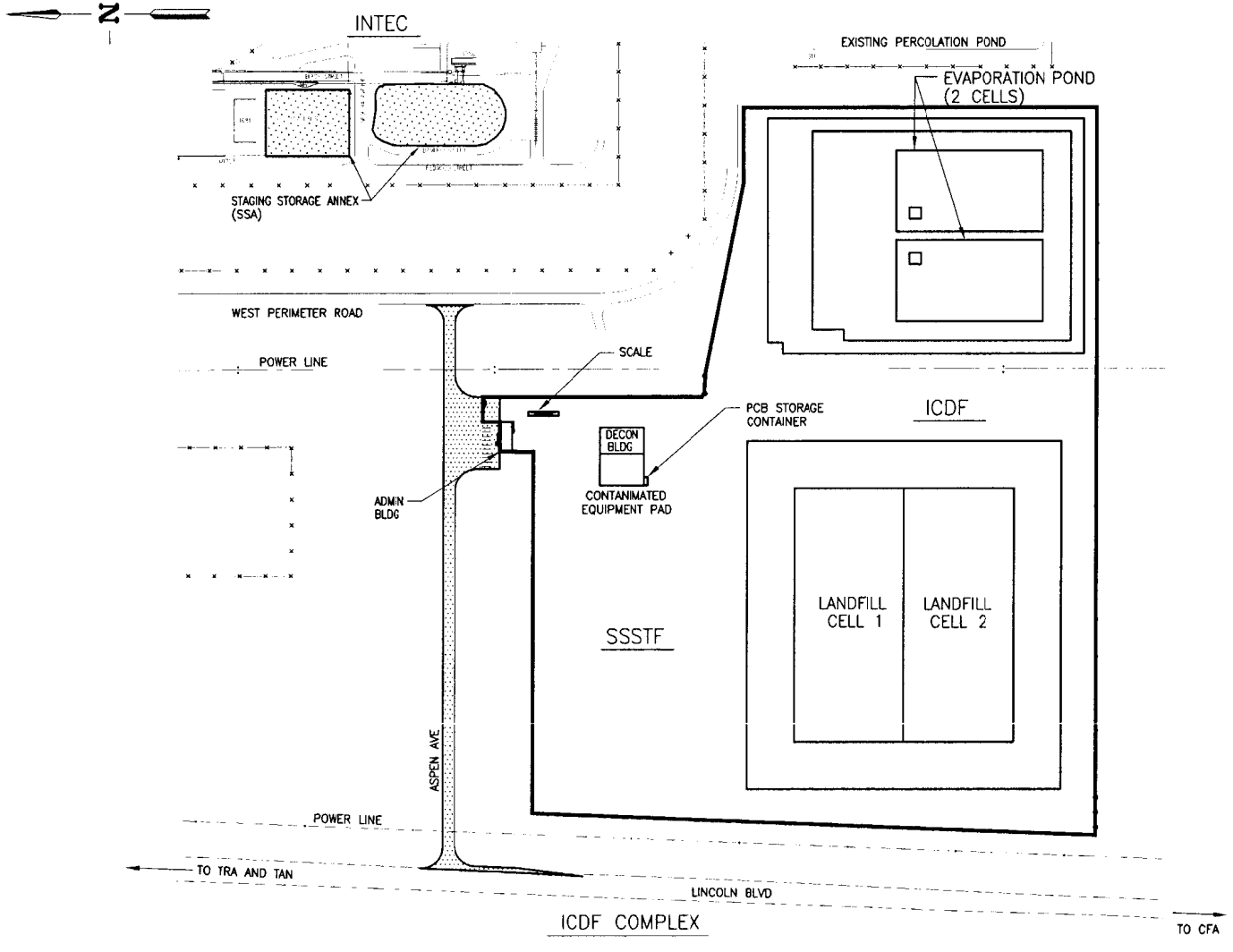

Figure 2-2. ICDF Complex in relation to INTEC.

3. WASTE GENERATION

This section identifies the assumptions that are associated with the anticipated waste streams and provides a preliminary description of the types of wastes that are expected to be generated.

3.1 Waste Stream Assumptions

The following assumptions apply to SSSTF waste streams associated with construction activities:

- Because the SSSTF construction activities are being conducted under the WAG 3 ROD, pursuant to CERCLA, all of the waste streams identified in this plan are considered CERCLA wastes.

- The majority of the anticipated construction waste streams are expected to be nonhazardous nonradioactive wastes, although some hazardous, mixed wastes, and radioactive wastes may be generated during construction activities directly related to implementation of the FFA/CO-approved remedial action.

- The disposition of unexpected waste will be determined on a case-by-case basis based on a waste profile analysis.

3.2 Waste Identification

The identification of waste streams in this WMP is based on only the construction activities associated with the SSSTF. Table 3-1 summarizes the wastes anticipated to be generated from the various activities associated with the construction of the SSSTF. The major anticipated waste type associated with these activities is industrial waste, including both conditional and nonconditional industrial waste streams. Although considered unlikely to be generated, potential hazardous waste streams are also identified.

Mixed low-level wastes (MLLW) and low-level wastes (LLW) are not expected to be present, based on baseline radiological conditions known to be present in the surface soils of the construction area. However, because the excavation and construction activities of the SSSTF project involve soils disturbance, the management of these wastes is briefly discussed in Section 4.

For those waste streams not specified in Table 3-1 below, a waste identification form will be completed modifying this plan, which will become part of Appendix A (see example sheet in Appendix A). Modifications to this plan will be in accordance with the terms of the FFA/CO for modification of a primary document.

Table 3-1. Waste stream summary table.

Waste Stream Description	Expected Type(s)[a]	Storage Location[b]	Planned Disposal[c]	Estimated Volume (ft^3)
Personal protective equipment (PPE) used in the performance of remedial actions in the CPP-95 and SSSTF area	Assumed CERCLA rad contaminated	Staging and Storage Annex (SSA)	ICDF landfill or Radioactive Waste Management Complex (RWMC) based on suitability determination.	NE[d]
PPE used in the performance of borrow pit soils retrieval for SSSTF remedial action implementation	Assumed CERCLA IW[e]	CERCLA IW[e] accumulation area	ICDF landfill or CFA[h] landfill based on suitability determination.	NE[d]
Miscellaneous maintenance waste from equipment decontamination necessary for implementing the construction activities (primarily discarded rags/cloths/plastic)[f]	Assumed CERCLA HW[g] (until HW[g] determination made)	SSA	ICDF landfill.	NE[d]
Routine industrial waste (office trash, poly bags, etc.) generated at the SSSTF construction area sites in the conduct of implementing the remedial action	CERCLA IW[e] (process knowledge nonhazardous)	CERCLA IW[c,e] accumulation area	INEEL Landfill Complex at CFA based on suitability determination.	NE[d]
Spill wastes/soil contaminated by (broken lines, hydraulic fuel, antifreeze, diesel fuel, oil, hydrocarbon-based fluids, etc.) generated at the SSSTF construction area in the conduct of implementing the remedial action	Assumed CERCLA IW[e] (pending completion of a waste profile determination)	CERCLA IW[e] accumulation area	ICDF landfill or CFA landfill based on suitability determination.	NE[d] Nonroutine waste stream
Unused chemicals (recyclable) generated in direct connection with implementing the SSSTF construction area activities	HW[g]	—	Waste will be tracked as CERCLA wastes and will be disposed of in accordance with the Off-Site Rule, if not recycled within 1 year.	NE[d]

Table 3-1. (continued).

Waste Stream Description	Expected Type(s)[a]	Storage Location[b]	Planned Disposal[c]	Estimated Volume (ft^3)
Solids from equipment decon at borrow pit areas (e.g., rags used for cleaning)	CERCLA IW[e]	CERCLA IW[e] accumulation area	ICDF landfill or CFA landfill based on suitability determination.	NE[d]
Solids from equipment decon (AOC) generated in direct connection with implementing the SSSTF construction remedial activities	Assumed CERCLA HW[g]	SSA	ICDF landfill or CFA landfill based on suitability determination.	NE[d]
Asphalt concrete, rip rap, and debris	IW[e]	CERCLA IW[e] accumulation area, where appropriate	CFA landfill.	NE[d]
Aqueous liquids from equipment decon (borrow pit areas) generated in direct connection with implementing the SSSTF construction activities	CERCLA IW[e] (unless process knowledge suggests otherwise)	CERCLA IW[e] accumulation area, where appropriate	Natural disposal with logging of location.	NE[d]
Liquids from equipment decon (AOC) generated in direct connection with implementing the SSSTF construction activities	Assumed CERCLA HW[g]	SSA	ICDF evaporation pond.	NE[d]
Routine used parts and equipment (filters, grease cartridges, hydraulic lines, etc.)	Assumed CERCLA HW[g]	SSA	ICDF landfill.	NE[d]
Nonroutine used parts and equipment (tracks, transmissions, engine parts, etc.) generated in direct connection with implementing the SSSTF construction activities	CERCLA IW[e]	—	Recycle, return to manufacturer; wastes and will be disposed of in accordance with the Off-Site Rule, if not recycled within 1 year.	NE[d]

Table 3-1. (continued).

Waste Stream Description	Expected Type(s)[a]	Storage Location[b]	Planned Disposal[c]	Estimated Volume (ft^3)
Wastes from clearing and grubbing (borrow pit areas) generated in direct connection with implementing the SSSTF construction activities	CERCLA IW[e]	Natural environment	Natural environment with logging of location.	NE[d]
Wastes from clearing and grubbing (AOC) generated in direct connection with implementing the SSSTF construction activities	Potentially rad contaminated (<23 pCi/g Cs-137; no further action)	Top soil pile	Reuse within CPP 95 AOC.	NE[d]
Batteries (recyclable)[i] generated in direct connection with implementing the SSSTF construction activities	Assumed CERCLA IW[e] (pending waste determination)	CERCLA IW[e] accumulation area	Electronic batteries – dispose in ICDF landfill or CFA Landfill Complex based on suitability determination. Equipment vehicle batteries - recycle wastes (disposed of in accordance with the Off-Site Rule, if not recycled within 1 year).	NE[d]
Light bulbs[i] generated in direct connection with implementing the SSSTF construction activities	Assumed CERCLA IW[e] (pending waste determination)	CERCLA IW[e] accumulation area	Recycle wastes (disposed of in accordance with the Off-Site Rule, if not recycled within 1 year) or disposed at CFA Landfill Complex.	NE[d]
Clean monitoring waste (RAD swipes, mazzlins, etc.)	IW[e]	CERCLA IW[e] accumulation area	INEEL landfill at the CFA Complex	NE[d]
Contaminated monitoring waste (RAD swipes, mazzlins, etc.)	Assumed HW[g]	SSA	ICDF landfill	NE[d]

Table 3-1. (continued).

Waste Stream Description	Expected Type(s)[a]	Storage Location[b]	Planned Disposal[c]	Estimated Volume (ft^3)
Unexpected waste generated in direct connection with implementing the SSSTF construction activities	Assumed CERCLA HW[g] (until HW[g] determination made)	SSA pending further determination	Prepare a waste identification form to be included in Appendix A (see appendix for example). The form will identify the appropriate storage location and planned disposal.	NE[d]

a. Waste type expected based on existing knowledge and assumptions. Final characterization of waste type based on complete hazardous waste determination (HWD) and evaluation of data collected (not necessary for nonconditional wastes).

b. A CERCLA industrial waste accumulation area refers to conditional and nonconditional industrial wastes. Nonconditional wastes can be stored in designated areas around the construction site. If conditional wastes are nonhazardous and nonradioactive, they can also be stored in designated areas around the construction site. However, if wastes, conditional or otherwise, are known or suspected of being hazardous or radioactive, they will be stored in a CERCLA Storage Area (CSA) and await disposal pending a HWD. (The SSA is the CSA for the ICDF Complex.) The storage areas would comply with 40 CFR 264.553, and any other substantive applicable or relevant and appropriate requirements (ARARs).

c. If these are contaminated and cannot be disposed implementing the normal INEEL programs then they will be staged in the SSA pending identification of the final disposal pathway.

d. NE—Not estimated due to lack of reasonable basis for an estimate (e.g., unknown maintenance assumptions) or disposal at the INEEL Landfill Complex at the CFA as industrial waste. However, it is estimated that <2% (~10,000 m^3) of the entire volume of the ICDF will be available for wastes other than CERCLA-contaminated soils.

e. Industrial waste.

f. All rags, cloths, etc. used at this site will be new.

g. Hazardous waste.

h. Central Facilities Area.

i. If the waste is determined to be hazardous, disposition will be in accordance with the applicable Hazardous Waste Management Act (HWMA) requirements (HWMA 1983).

4. WASTE MANAGEMENT

Wastes resulting from the activities identified in this WMP will be managed and disposed in accordance with applicable or relevant and appropriate requirements (ARARs). Wastes being disposed off the INEEL will be managed in accordance with the Off-Site Rule. Wastes that are not generated in performance of the ROD-authorized remedial action are not CERCLA wastes and will be managed in accordance with local, state, and federal requirements. Disposal of CERCLA waste will be in accordance with the Final ROD for OU 3-13 (DOE-ID 1999), this WMP, and appropriate regulations.

4.1 Characterization

A hazardous waste determination (HWD) will be performed on all waste generated during construction activities of the SSSTF in accordance with 40 CFR 262.11. As outlined in Section 3, a preliminary classification has been made of anticipated waste types based on process knowledge regarding the source(s) of the expected waste. The HWD will be performed to provide information for follow-on management. All appropriate and required documentation of the HWD will be completed.

The CERCLA HWD will evaluate all available information and identify any RCRA waste codes and radionuclide information to facilitate management. Upon the identification of any suspected hazardous waste within the construction area, the soil/media will be segregated and sampled, if needed, to support the HWD. As necessary, a radiological screen will be performed with appropriate screening methods. Any waste stream determined through analytical testing to contain radionuclides above specified levels will be classified as LLW or MLLW waste, as applicable. Although the likelihood of encountering Toxic Substances Control Act (TSCA) wastes during construction activities is very low, such wastes will be addressed per 40 CFR 761 should they be encountered.

Waste will be staged and/or stored as appropriate in the SSA or at satellite IW locations within the AOC and labeled appropriately. A logbook will be kept at the site and will record generation date, sampling dates, and other pertinent information to facilitate management of the radiologically or chemically contaminated CERCLA wastes.

4.2 Waste Minimization and Segregation

Waste minimization for this project will primarily be achieved through design and planning to ensure efficient operations and avoid the generation of unnecessary wastes. During the pre-job briefing, personnel will be encouraged to institute practices to support waste minimization, and the discussion will emphasize waste reduction philosophies and techniques. These practices may include, but will not be limited to:

- Reusing items when practical
- Segregating reusable items such as personal protective equipment (PPE) and tools
- Substituting recyclable or incinerable items for disposable items
- Minimizing and avoiding use of hazardous chemicals
- Segregating contaminated from uncontaminated waste.

4.3 On-Site Management and Disposition

The general management approach to be implemented for wastes generated through SSSTF construction activities is on-Site interim storage and disposal (when possible). Waste stored in the SSA

will initially be characterized for compatibility. The results of quality-assured sampling and analysis data will be submitted to the Agencies within the 120-day time frame identified in the FFA/CO.

As previously discussed, predominantly industrial, conditional, and nonconditional industrial wastes are anticipated. Although unlikely to be generated, hazardous, mixed, and/or radioactive wastes may be produced.

All wastes generated during the SSSTF construction activities will be segregated, containerized, labeled, and stored in accordance with ARARs. Nonhazardous and nonradioactive industrial wastes will be stored in designated waste accumulation areas at the construction site. These areas may be established during construction on an as-needed basis within the AOC and be managed in accordance with ARARs. Wastes that are known or suspected of being hazardous or radioactive will be stored in the SSA pending a waste determination.

All wastes processed for storage or disposal at the INEEL are subject to compliance with the requirements defined by the appropriate Waste Acceptance Criteria (WAC) of the accepting storage or disposal facility. Wastes that are disposed on-Site and are not disposed of in the ICDF landfill will include a suitability determination prior to shipment. Wastes that are disposed of off the INEEL will be managed in accordance with the Off-Site Rule.

Hazardous or radioactive wastes that do not comply with this Waste Management Plan criteria or the ICDF Complex WACs will be disposed off the INEEL in accordance with the Off-Site Rule, 40 CFR 300.440.

The activities associated with the SSSTF, as discussed in Section 1, include generation of construction, maintenance, and administrative/support service wastes. In the following subsections, a brief discussion is provided of the management and disposal of the anticipated excavation and construction waste streams.

4.3.1 Industrial Waste

All CERCLA conditional industrial waste (e.g., oil filters, fuel filters, lead or chrome-based paints) will be tracked using the INEEL electronic database. Non-conditional industrial waste streams are not required to be tracked using the INEEL electronic database and have been identified in Table 3-1 along with the appropriate storage location, the proposed storage or disposal facility, or the appropriate INEEL program to be utilized to recycle the waste. Non-conditional industrial waste that has been shown to be nonhazardous and nonradioactive and that does not fit into an existing recycle program, materials exchange program, or the excess program will be sent to the CFA landfill. It is the intent of DOE to use existing waste disposal practices currently in place at the INEEL to dispose of these waste streams rather than store waste unnecessarily. Only those wastes that do not have a clear disposal path within the existing INEEL system will be maintained at the SSA.

Wastes identified in Table 3-1 as hazardous, assumed hazardous, or potentially radiologically contaminated will be stored at the SSA pending a CERCLA HWD and an identification of the final disposal pathway. Waste streams not listed in Table 3-1 will require a separate waste identification form (see Appendix A), which will amend this plan, in accordance with the terms of the FFA/CO. These forms will provide preliminary information to begin the HWD process.

In all cases when a waste may be recycled, that option will be considered first and disposal will be considered the last option. Any material that can be recycled or reused will be sent to the Property Reutilization and Disposal Office.

4.3.2 Potential Hazardous, Low-Level, or Mixed Wastes

Potential hazardous, low-level, or mixed wastes are not expected to be generated at the SSSTF construction site, based on existing characterization data from the soils at the construction area. However, in the event they are encountered (as determined by using applicable screening methods or process knowledge), wastes will be containerized as required and temporarily stored in the SSA pending a CERCLA HWD and ultimate disposition. This waste will be tracked using the INEEL's electronic database.

4.3.3 Unexpected Waste

Any unexpected waste will go through the HWD process. If the waste is determined to be conditional industrial, radioactively contaminated, or hazardous, it will be tracked as CERCLA waste by the INEEL's electronic database. A separate waste identification form will be developed and inserted in Appendix A as an amendment to this Plan (see Appendix A for an example). Although the potential exists for the generation of limited quantities of RCRA hazardous wastes, only a limited amount is anticipated. Unwanted, unused chemicals, paints, and oils that are still acceptable for use can be evaluated for potential use on the INEEL Material Exchange Database to avoid waste generation. Wastes not recycled within 1 year will be disposed of in accordance with the Off-Site Rule. All potentially hazardous wastes will be containerized as required and temporarily stored in the SSA, pending a HWD and ultimate disposition.

4.4 Packaging

Packaging of all radioactively contaminated and hazardous waste materials generated will be in compliance with the RCRA regulations found in 40 CFR 264 Subpart I and the applicable Department of Transportation (DOT) regulations found in 49 CFR 172. Packaging and transportation personnel will be consulted before the waste is generated, so that the specific types of containers required for the anticipated wastes can be identified.

4.5 Labeling

Containers of conditional industrial and nonconditional industrial wastes do not require labeling.

All radioactively contaminated and hazardous waste containers will be labeled appropriately and will include the words, "CERCLA WASTE" and the appropriate waste characterization information. This CERCLA remediation waste will have a label that includes an accumulation start date, waste description, applicable waste codes, and the generator's name. Each of these containers will have a barcode label generated from the INEEL electronic database for tracking waste. All container labels will be placed where they are clearly visible during storage and shipment, with the label placements dependent on the type of waste container. During shipment, if applicable, other information must be included on containers such as applicable DOT labels, manifest number, gross weight, and the shipper's complete name and address.

4.6 Storage, Inspections, and Record Keeping

Any low-level, mixed, or hazardous wastes generated during SSSTF construction activities will be temporarily managed within the WAG 3 AOC under the appropriate substantive requirements. Placement in the AOC is triggered when (1) wastes are treated within the AOC, (2) wastes are managed so as to constitute a RCRA Storage Unit (40 CFR 260.10), or (3) when wastes are transferred from a landfill to a storage area and back to the landfill. Wastes may be managed in a temporary CERCLA Storage Area

(CSA) near the construction site until they can be properly characterized. Once characterization is complete, the waste can be transferred into the SSA.

Secondary containment will be provided for liquid wastes. This will be accomplished with the use of containers designed and constructed to have built-in secondary containment or with the placement of an impermeable liner/physical barrier at the site to contain any stored liquid wastes. Nonaqueous wastes will be packaged and containerized to facilitate storage. The emergency response procedures established in the "INEEL Emergency Plan/RCRA Contingency Plan, Appendix L20" (PLN-114) will be used, if needed. Upon completion of activities, wastes will be transported to the SSA for management.

As wastes are placed into a CSA, a storage area operator will inventory the containers on an activity sheet. Inventory information will consist of the container's electronic database barcode, the container type, waste type (including waste codes), and the volume of the waste in the container. Proper storage of wastes will occur to ensure that incompatible waste types are segregated.

The CSA will be inspected on a regular basis as required for leaks, spills, aisle space, damaged containers, compatibility of the waste, segregation requirements, appropriate labels, and appropriate signs posted. Inspections will be logged in the storage area logbook. Inspections of the CSA will be performed weekly[a] to ensure protectiveness and will include inspections of

- Containers to ascertain their condition, confirm the presence of required labels, and ensure that incompatible waste is not placed in the area
- Storage area to ascertain any deficiencies (e.g., housekeeping, aisle space, emergency equipment)
- Logbook to ensure inventory records are up to data and that incompatible waste is not placed in the area.

Details regarding waste stream segregation will be incorporated into operational procedures associated with both the construction operations and the project operation and management (O&M) plans. Any recordkeeping requirements for these wastes will also follow FFA/CO requirements.

4.7 Transportation

All CERCLA remediation waste generated as a result of the activities associated with the SSSTF construction activities described in this plan will be transported in accordance with requirements identified in the applicable WAC and appropriate DOT regulations, as necessary. INEEL services personnel will be responsible for shipping all CERCLA remediation waste. Industrial waste transported to the INEEL Landfill Complex at the CFA will be transported by personnel who have obtained an INEEL Form 134, "INEEL Landfill User's Permit." INEEL waste handlers can provide assistance in transporting industrial waste.

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a. If the tanks become necessary, the inspections will be changed to a daily schedule.

5. REFERENCES

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40 CFR 264.553, "Temporary units," *Code of Federal Regulations*, Office of the Federal Register, July 1, 2000.

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54 FR 29820, 1989, "National Priorities List for Uncontrolled Hazardous Waste Sites: Update #9, Federal Facility Sites," *Federal Register*, FRL-3615-2, U.S. Environmental Protection Agency, July 14, 1989.

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Appendix A

Example of Waste Identification Form

WASTE IDENTIFICATION FORM

Waste: _____

Tracking ID: _____

How Generated? (narrative) _____

Is it a CERCLA Waste? Yes No _____

Characteristics: _____

Applicable waste codes: _____

Storage Plan: _____

Disposal Plan: _____